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8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 FREMONT EMERGENCY SERVICES
11 (MANDAVIA), LTD., a Nevada professional
corporation,

12 Plaintiff,

13 vs.

14 UNITED HEALTHCARE INSURANCE
15 COMPANY, a Connecticut corporation;
16 UNITED HEALTH CARE SERVICES INC.,
dba UNITEDHEALTHCARE, a Minnesota
corporation; UMR, INC., dba UNITED
17 MEDICAL RESOURCES, a Delaware
corporation; OXFORD HEALTH PLANS,
INC., a Delaware corporation; SIERRA
18 HEALTH AND LIFE INSURANCE
COMPANY, INC., a Nevada corporation;
19 SIERRA HEALTH-CARE OPTIONS, INC.,
a Nevada corporation; HEALTH PLAN OF
20 NEVADA, INC., a Nevada corporation;
DOES 1-10; ROE ENTITIES 11-20,

21 Defendants.

Case No.: 2:19-cv-00832-JAD-VCF

**STIPULATION AND ORDER TO
EXTEND RESPONSE DEADLINES RE:
(1) MOTION TO DISMISS AND (2)
MOTION TO REMAND**

(First Request)

23 Pursuant to Local Rules IA 6-1 and 7-1, plaintiff Fremont Emergency Services
24 (Mandavia), Ltd. (“Fremont”) and defendants UnitedHealthcare Insurance Company, United
25 HealthCare Services, Inc., UMR, Inc., Oxford Health Plans, Inc., Sierra Health and Life Insurance
26 Co., Inc., Sierra Health-Care Options, Inc., and Health Plan of Nevada, Inc. (collectively, “United
27 HealthCare”) hereby stipulate, agree and respectfully request that the Court extend the current
28 briefing deadlines on Fremont’s response to United HealthCare’s Motion to Dismiss (ECF No. 4)

1 and United HealthCare's response to Fremont's Motion to Remand (ECF No. 5) as follows:

2 1. Fremont's deadline to respond to United HealthCare's Motion to Dismiss (ECF
3 No. 4) shall be extended from June 4, 2019 to June 18, 2019; and

4 2. United HealthCare's deadline to respond to Fremont's Motion to Remand (ECF
5 No. 5) shall be extended from June 7, 2019 to June 21, 2019.

6 This is the first request by the parties to extend briefing on United HealthCare's motion to
7 dismiss and Fremont's motion to remand. Fremont and United HealthCare each respectively
8 request additional time to respond to the pending motion. The request is not for purposes of delay.

9 DATED this 3rd day of June, 2019.

10 McDONALD CARANO LLP

11 By: /s/ Kristen T. Gallagher

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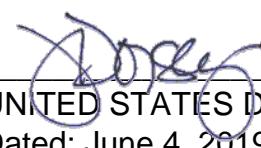
WEINBERG, WHEELER, HUGGINS,
GUNN & DIAL, LLC

By: /s/ Colby L. Balkenbush

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34 United HealthCare Services, Inc., UMR,
35 Inc., Oxford Health Plans, Inc., Sierra
36 Health and Life Insurance Co., Inc., Sierra
37 Health-Care Options, Inc., and Health
38 Plan of Nevada, Inc.*

39 **IT IS SO ORDERED.**

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42 UNITED STATES DISTRICT JUDGE
43 Dated: June 4, 2019.